

### **REMARKS**

Claim 13 has been amended. Claims 13 to 20 remain active in this application.

Claims 13 to 16 were rejected under 35 U.S.C. 103(a) as being unpatentable over Watanabe (U.S. 5,497,545) in view of Galloway (EP 633,608). The rejection is respectfully traversed.

Claim 13 requires, among other features, a membrane for use in conjunction with a semiconductor carrier. No such device is taught or suggested by Watanabe, Galloway or any proper combination of these references.

Claim 13 further requires an electrically insulating substrate removably securable to a semiconductor carrier. No such device is taught or suggested by Watanabe, Galloway or any proper combination of these references.

Claim 13 still further requires a stud coupled to the interconnect pattern on the substrate, the stud comprising a gold ball and an electrically conductive compliant material coating over a portion of the gold ball opposed to the substrate. No such device is taught or suggested by Watanabe, Galloway or any proper combination of these references.

While the examiner alleges that Galloway teaches forming a compliant material of epoxy resin coating, the record fails to corroborate this allegation. The fact that an epoxy can be compliant does not mean that all epoxies are compliant and, clearly, no such showing has been made on the record. Furthermore, a study of Galloway with reference to the conductive epoxy bump 18 at column 3, line 50 to column 4, line 27 appears to indicate that the epoxy of Galloway is not compliant and is used for an entirely different purpose from that of the subject invention. In Galloway, the epoxy appears to be used to equalize the height of the bumps 17 and is therefore meant not to be compliant. It follows that the suggestion to add a compliance to the bump of Watanabe is not only not suggested by the prior art, but such addition to Watanabe

would be a change to a device which is also entirely different from the membrane claimed herein.

Claims 14 to 16 depend from claim 13 and therefore define patentably over the applied references for at least the reasons presented above with reference to claim 13.

Claims 17 to 20 were rejected under 35 U.S.C. 103(a) as being unpatentable over Watanabe in view of Galloway, further in view of Lytle (U.S. 5,674,780). The rejection is respectfully traversed for the reasons presented above with reference to claim 13 since these claims depend from claim 13 and Lytle fails to overcome the deficiencies of the other references as noted above..

Claims 13, 15 and 16 were rejected under 35 U.S.C. 103(a) as being unpatentable over Bintlage (U.S. 5,650,595) in view of Galloway. The rejection is respectfully traversed since Bintlage has the same deficiency as noted above with reference to Watanabe and Galloway has the deficiencies as noted above.

In view of the above remarks, favorable reconsideration and allowance are respectfully requested.

Respectfully submitted,



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